

Massimo Gammella

141-42 72<sup>nd</sup> Dr.

Flushing, NY 11050

New York August 22, 2024

The Honorable Judge Steven I. Locke

United States District Court

Eastern District of New York

100 Federal Plaza

Central Islip, NY 11717

FILED  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

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Re: Case No. 20-cv-04026 (NCM) (SIL) Hernandez v. Rosso Uptown

**Motion opposing Default Judgement Rosso Uptown LTD and personal liabilities.**

Dear Judge Locke, hope this letter finds you well,

I am writing to you regarding the above reference case and specifically Mr. Moser's request to move for a default judgment against my closed and dissolved corporation Rosso Uptown.

I fully understand that a corporation must be represented by a licensed attorney in legal proceedings, as a separate legal entity, the corporation was distinct from me personally, and its liabilities and court and expenses sustained by opposing counsel, should not automatically transfer to me as an individual.

Furthermore, I respectfully request that the court hold off on granting a default judgment against the corporation, a trial is forthcoming in which I am representing myself, and proceeding to a default judgement against the corporation before a final decision is reached in that trial would be prejudicial and could lead to an unjust outcome.

I respectfully ask, your honor, to consider the above points and to delay any action on the default judgment until the trial has concluded and the court has had the opportunity to fully consider all the facts and circumstances.

Thank you for your consideration, I am prepared to provide any additional information the court may require and will continue to cooperate fully with the legal process.

Sincerely,

Massimo Gammella



08/22/24

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